



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 2, 2023

BY ECF

The Honorable Jennifer H. Rearden
United States District Judge
500 Pearl Street
Southern District of New York
New York, New York 10007

Re: *United States v. Charles McGonigal and Sergey Shestakov, 23 Cr. 16 (JHR)*

Dear Judge Rearden:

The Government writes to provide a status update.

First, the Government responded to Sergey Shestakov's request at the May 10, 2023 status conference for the discovery in *United States v. Olga Shriki*, 22 Cr. 518 (PKC) (S.D.N.Y.). The Government informed Shestakov that the prosecution team in this case does not possess the evidence gathered in *Shriki*, and it is not aware of any evidence in that case that constitutes *Brady* or *Giglio* or is material to the defense in this case.

Second, on May 19, 2023, the Government produced to Shestakov the discovery material produced by the United States Attorney's Office for the District of Columbia ("USAO-DC") in *United States v. McGonigal*, 23 Cr. 21 (CKK) (D.D.C.). The Government recently received additional discovery material from USAO-DC, and will produce it to Shestakov's counsel today.

Third, on June 1, 2023, the Government made a supplemental discovery production, which included a tax order, a tax order application, and materials received in response to the tax order.

Respectfully submitted,

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Cc: Defense Counsel (by ECF)